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SUBJECT: Responds to NRC ltr re violations noted in Insp Rept 50-261/88-28.Corrective actions:concrete void filled.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/88-28

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Violation initiated by NRC Inspection Report No. 50-261/88-28.

Severity Level IV Violation (RII-88-28-02-SL4)

10 CFR 50, Appendix B, Criterion XII requires that measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Plant Technical Specification 4.0.1 requires that inservice inspection and testing of ASME Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

Contrary to the above, the licensee did not have a program to control or calibrate stop watches which were utilized for stroke timing of safety-related valves or for the timing of other equipment of safety significance.

Reply

(1) Admission or denial of the violation

CP&L acknowledges the violation.

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(2) The reason for the violation

Stopwatches, historically, have been considered as measuring devices which require no special calibration measures. It has been presumed that normal commercial practices provide adequate accuracy for stopwatches, similar to that provided for rulers, tape measures, and levels. The stopwatch utilized for stroke timing of safety-related valves and for timing of other equipment of safety significance has been controlled by Plant Operations personnel and stored in the Unit 2 Control Room. This control and the accuracy of the stopwatch as purchased was believed to have assured adequate performance of the timepiece.

(3) The corrective steps which have been taken and the results achieved

The stopwatch maintained by Plant Operations personnel for utilization in the stroke timing of safety-related valves and the timing of other equipment of safety significance has been sent offsite to the Shearon Harris Nuclear Power Plant Maintenance Calibration Laboratory for a calibration check in accordance with their procedure for the calibration of stopwatches using a Multi-amp reference standard digital timer, MTE-038. The stopwatch has been found to be accurate within +/- .05 seconds, a stricter tolerance than required for measurements of time pursuant to Section XI of the ASME Code.

(4) The corrective steps which will be taken to avoid further violations

Plant Operations procedure OMM-017, for the calibration, control, and repair of portable test equipment will be revised to also include stopwatches utilized for the stroke timing of safety-related valves and for the timing of other equipment of safety significance. Stopwatches will be calibrated on at least an annual basis.

Instructions will be added to Plant surveillance test procedures which require use of a stopwatch for the stroke timing of safety-related valves and the timing of other equipment of safety significance to assure utilization of a calibrated stopwatch.

(5) The date when full compliance will be achieved

March 31, 1989.

Severity Level IV Violation (RII-88-28-09-SL4)

10 CFR 50, Appendix B, Criterion XVI, requires the licensee to establish measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, the licensee failed to establish measures to promptly identify and correct conditions adverse to quality in that, malfunctions (identified between 1985 and January 1988, and again subsequent to January 1988) in the Environmental and Radiation Control Building sump pump controllers and the sump high level alarm system were not promptly corrected. Failure of the controller and the alarm to function properly resulted in the overflow of the sump and the introduction of radioactive liquid into the site storm drain system in August 1988.

Reply

(1) Admission or denial of the violation

CP&L acknowledges the violation.

(2) The reason for the violation

The backflow of water from the Environmental and Radiation Control Building sump into the floor drains resulted from a malfunction of the sump pump control system. The cause of the malfunction is still under investigation. Completion of the investigation may require replacing the sump level control probes. The probes are long lead procurement items and are not expected to be delivered until February 1989.

The introduction of radioactive liquid into the site storm drain system resulted from the backflow of water escaping the building by way of a void in the concrete around one of the laboratory floor drains, apparently due to original concrete placement.

The problems with the sump pump control system were recognized as requiring resolution but a low priority was assigned these actions since the condition could be corrected by manual operation of the sump pump periodically to limit backflow. In addition, the backflow of water from the sump and the subsequent overflow into the site storm drain system via the void in the concrete around the floor drain was not expected. The presence of the void was not detected until the August 1988 event.

Investigation into the event found that the void in the concrete had allowed a small amount of radioactive liquid to be released to the ground directly under the Environmental and Radiation Control Building floor drain. The liquid runoff was then collected in a French drain and discharged into the storm drain.

The radioactivity in the storm drain was measured as 7E-6 μCi/cc, with no radionuclides detected at the site release point.

(3) The corrective steps which have been taken and the results achieved

The concrete void around the floor drain has been filled with cement grout. To assure the potential for a leak path has been precluded, the laboratory waste drainage system has been successfully tested with potable water.

New sump level probes have been ordered, with delivery expected in February 1989, dependent on fabrication and manufacturing.

In the interim, manual operation of the sump pump will continue when necessary to limit backflow from the Environmental and Radiation Control Building sump into the floor drains.

(4) The corrective steps which will be taken to avoid further violations

The root cause of the sump pump controllers and sump high level alarm system malfunctions and of the void in the concrete around the floor drain in the Environmental and Radiation Control Building will be analyzed and corrected in accordance with Plant procedure PLP-026, Corrective Action Program. This procedure was established earlier in 1988 to identify, document, evaluate, and track correction of significant off-normal conditions and provide the process necessary to ensure root causes are analyzed and corrected.

A supplemental reply to the violation will be submitted to the NRC within 30 days following completion of the root cause investigation.

(5) The date when full compliance will be achieved

To be determined as part of the root cause investigation.

Should you have any question concerning this submittal, please contact Mr. J. M. Curley, telephone (803) 383-1367.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

DAS:dwm

cc: Mr. M. L. Ernst
Mr. L. W. Garner
INPO